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## KECK, MAHIN & CATE

FILE NUMBER 45691-450

DIRECT DIAL 202-789-3401

April 13, 1995

William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Billed Party Preference For InterLATA 0+ Calls, CC Docket No. 92-77

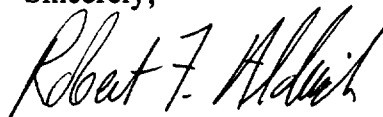
Petition of the National Association of Attorneys General Telecommunications  
Subcommittee for Rules to Require Additional Disclosures by Operator Service  
Providers of Public Phones, RM-8606

Dear Mr. Caton:

On behalf of American Public Communications Council ("APCC") enclosed is an original and four copies of a corrected attachment to the "Comments of the American Public Communications Council on the Industry Coalition's Proposal for Rate Ceilings and on the NAAG Petition for Rulemaking," filed yesterday, April 12, 1995, in response to the Commission's Public Notice, DA 95-473, released March 13, 1995. Attached to APCC's Comments was an "Analysis of 101 Operator Service Rate Complaints Filed at the FCC Between May 1, 1994 and August 15, 1994." By mistake, an incomplete version of the attachment was filed. The complete attachment is filed herewith.

A copy of this letter and the corrected attachment will be served tomorrow on all parties that APCC can identify as having filed comments in response to the Public Notice. Therefore, no party will be prejudiced by the filing of this corrected attachment.

Sincerely,



Robert F. Aldrich

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Corrected Copy

**ATTACHMENT 1**

**ANALYSIS OF 101 OPERATOR SERVICE RATE COMPLAINTS**

**FILED AT THE FCC**

**BETWEEN MAY 1, 1994 AND AUGUST 15, 1994**

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
0.5	\$5.66	
1	\$5.38	\$3.75
1	\$5.64	
1	\$5.09	
1	\$3.42	
1	\$3.22	
1	\$6.28	
1	\$7.14	
1	\$9.85	
1	\$7.82	
1	\$6.54	
1	\$6.77	
1	\$6.86	
2	\$5.12	\$4.25
2	\$5.87	
2	\$4.43	
2	\$3.42	
2	\$3.01	
2	\$4.25	
2	\$4.02	
2	\$8.07	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
2	\$8.07	
2	\$8.70	
2	\$8.16	
2	\$6.57	
2	\$6.50	
2	\$7.32	
2	\$5.32	
3	\$8.19	\$4.75
3	\$5.81	
3	\$8.44	
3	\$7.39	
3	\$3.95	
3	\$6.99	
3	\$6.99	
3	\$8.86	
3	\$9.27	
3	\$24.12	
3	\$9.24	
3	\$9.25	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
4	\$11.26	\$5.25
4	\$13.31	
4	\$10.96	
4	\$8.88	
5	\$6.27	\$5.50
5	\$12.48	
5	\$8.68	
6	\$8.64	\$5.95
6	\$12.48	
6	\$13.38	
6	\$5.89	
6	\$13.92	
7	\$26.74	\$6.20
9	\$13.37	\$7.00
9	\$18.00	
9	\$18.00	
9	\$17.91	
9	\$12.42	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
9	\$18.27	
10	\$20.51	\$7.35
10	\$16.97	
10	\$19.28	
10	\$19.30	
11	\$12.25	\$7.70
11	\$11.73	
11	\$19.98	
11	\$8.56	
11	\$19.18	
11	\$52.99	
13	\$19.84	\$8.40
13	\$14.04	
13	\$14.62	
13	\$28.21	
14	\$22.54	\$8.75
14	\$21.98	
14	\$13.17	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
14	\$9.13	
15	\$23.07	\$9.10
15	\$23.10	
15	\$20.63	
15	\$42.30	
16	\$72.99	\$9.45
17	\$10.06	\$9.80
17	\$19.11	
17	\$23.46	
18	\$10.84	\$10.15
18	\$24.66	
18	\$13.82	
18	\$21.24	
18	\$24.66	
19	\$29.36	\$10.50
19	\$25.08	
19	\$23.37	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
20	\$12.22	\$10.85
20	\$21.84	
24	\$13.06	\$12.25
35	\$32.73	\$16.10
69	\$77.63	\$28.00
81	\$142.56	\$32.20
104	\$113.36	\$40.25
120	\$116.28	\$45.85